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A GREAT SALT LAKE WATER QUALITY STRATEGY



Photo courtesy of Charles Uibel—greatsaltlakephotos.com

April 2012

Utah Division of Water Quality

A water quality strategy to ensure Great Salt Lake continues to provide its important recreational, ecological, and economic benefits for current and future generations.

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This Great Salt Lake Water Quality Strategy is available on the Internet at:

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ACRONYMS AND ABBREVIATIONS

CWA	Clean Water Act
FFSL	Utah Division of Forestry, Fire, and State Lands
POTW	Publicly Owned Treatment Works
UAC	Utah Administrative Code
UDWQ	Utah Division of Water Quality
UPDES	Utah Pollution Discharge Elimination System

A GREAT SALT LAKE WATER QUALITY STRATEGY

UTAH DIVISION OF WATER QUALITY

1 EXECUTIVE SUMMARY

2 Great Salt Lake is of vital economic importance, contributing over \$1 billion to Utah's economy each
3 year (Bioeconomics, Inc., 2012). The lake is also of critical ecological importance to the millions of
4 birds who depend on the lake's resources. The Utah Division of Water Quality (UDWQ) has worked to
5 ensure that water quality remains sufficient to maintain the lake's many important benefits. However,
6 these efforts have been undertaken without an overarching plan and vision appropriate for this
7 unique resource. Water quality rules applied elsewhere cannot be directly translated to Great Salt
8 Lake. As a result, permits are difficult to develop and are often appealed. More importantly, it is
9 challenging to determine scientifically what is needed to ensure the protection of the lake's biological
10 and recreational uses. It has become increasingly apparent—to both UDWQ and our stakeholders—
11 that filling this knowledge gap is of vital importance. This effort will require a significant commitment
12 of resources, along with careful planning to ensure efficient and effective use of these resources. As a
13 result, UDWQ has prepared a Water Quality Strategy that defines a comprehensive water quality

14 approach for protecting the water quality of Great Salt Lake and its surrounding wetlands. Details
15 for these planning efforts are modular, with several components that provide details of UDWQ’s
16 approach for stakeholder input. This document provides important background materials that explain
17 why a water quality approach specifically aimed at Great Salt Lake is both needed and
18 appropriate. Next the document introduces several important components of the strategy and
19 discusses how each component relates to ongoing management efforts for Great Salt Lake.

20 I. UDWQ’S VISION AND NEED FOR A GREAT SALT LAKE WATER 21 QUALITY STRATEGY

22 Great Salt Lake is of hemispheric importance as both a refueling stop for millions of migratory birds
23 and a nesting area for others. Eighty percent of Utah’s wetlands surround the lake. Over \$1 billion
24 per year (Bioeconomics, Inc., 2012) are contributed to Utah’s economy from the mineral extraction
25 industry, duck hunting clubs, and the brine shrimp industry, which are all dependent on the vitality of
26 the lake. Nature enthusiasts flock to the lake because of its ecological importance. Utahans draw a
27 significant amount of their heritage and identity from the lake. As pressures increase regarding
28 appropriate uses and protections for the lake, so does the need to manage this resource proactively
29 and wisely.

30 Utah citizens continue to express a desire
31 to be responsible stewards of this
32 wonderful treasure—Great Salt Lake.
33 Entrusted with the responsibility of
34 protecting water quality of the lake,
35 UDWQ intends to fulfill its responsibilities

*UDWQ’s Vision for Great Salt Lake:
Great Salt Lake provides its important
recreational, ecological, and economic
benefits for current and future generations.*

36 in the lake’s management. Together with our state and federal partners, UDWQ is committed to
37 ensuring that the lake continues to benefit those who use and enjoy Great Salt Lake and its many
38 resources. In so doing, UDWQ will be guided by the following vision: Great Salt Lake provides its
39 important recreational, ecological, and economic benefits for current and future generations.

40 UDWQ recognizes Great Salt Lake’s significance and indeed is required by law to protect the lake’s
41 “beneficial uses”—recreational activities such as swimming and duck hunting and protection for
42 waterfowl, shorebirds, and other water-oriented wildlife including their necessary food chain (Utah
43 Administrative Code [UAC] R317-2-6). *Protecting these beneficial uses—by ensuring the protection of
44 the lake’s chemical, physical, and biological integrity— is UDWQ’s primary water quality objective.* Yet
45 the extent that the lake is resilient to or threatened by pressures such as population growth and

46 pollutant inputs—and how these pressures are affecting the
47 lake’s beneficial uses—is difficult to assess. Great Salt Lake is
48 so unique that data gathered from other aquatic
49 environments may or may not apply. However, decisions
50 regarding lake water quality continue to be made, and the
51 many stewards of the lake rightfully expect that these
52 decisions be based on the best available science and a
53 thorough understanding of the lake’s unique characteristics,
54 which is not always possible due to an incomplete
55 understanding of this unique ecosystem.

56 Currently, there are few clearly defined water quality
57 benchmarks (i.e., numeric criteria) for Great Salt Lake that
58 can be used to interpret the potential impacts of existing or
59 proposed pollutant inputs to the lake. This lack of clearly
60 defined water quality protections for Great Salt Lake
61 potentially leads to regulatory decisions that are either over-
62 or underprotective of the lake’s important uses.
63 Overprotective water quality regulations are needlessly
64 costly for industry and municipalities. Underprotective
65 regulations are potentially illegal and would be detrimental
66 to the lake’s ecosystem, which supports millions of birds, not to
67 mention a multimillion-dollar brine shrimp industry. Clearly, a
68 strategy is needed to fill key knowledge gaps to generate
69 appropriate water quality protections for Great Salt Lake in
70 the most efficient and scientifically defensible way possible.

71 UDWQ continues to make environmental decisions based on
72 the best available data and information, yet the uncertainty
73 surrounding appropriate requirements for the lake continually
74 leads to numerous challenges to many of these decisions. A
75 new water quality strategy, based on acquiring information
76 about the lake’s unique characteristics and needs, and
77 translating this information into appropriate and transparent policy, is required. UDWQ has designed
78 this water quality strategy to fill critical knowledge gaps, improve the precision and clarity of

Great Salt Lake (GSL) Facts:

4th largest terminal lake (no outlet) in the world

Remnant of Lake Bonneville—a prehistoric lake that was 10 times larger than the GSL

Average 75 miles long, 35 miles wide, and 14 feet deep

Primary sources of water are from precipitation and the Bear, Jordan, Ogden, and Weber Rivers

Salinity (“saltiness”) varies throughout the lake and ranges from freshwater to 7 times saltier than the ocean

Mostly fish free, the keystone species are brine shrimp and brine flies

Causeways divide the lake into four distinct bays (Gunnison, Gilbert, Bear River, and Farmington)

80% (360,000 acres) of Utah’s wetlands are adjacent to the lake

7 to 12 million birds, 250 species, visit the lake every year

\$1.3 billion in total economic output to the State of Utah is generated by GSL industry, aquaculture and recreation.

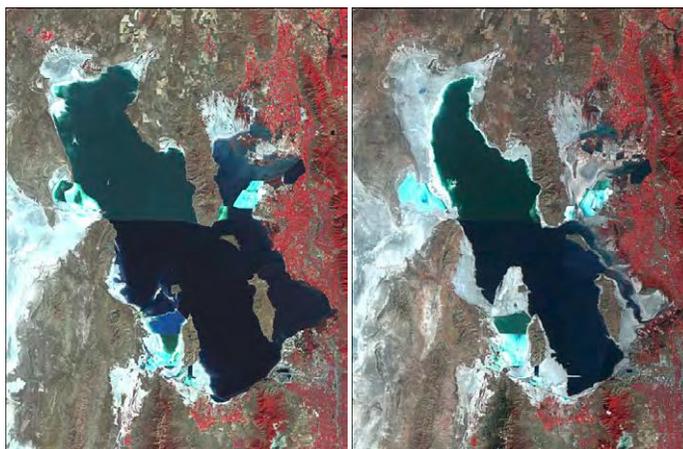
79 UDWQ's water quality management decisions, reduce regulatory uncertainty for regulated entities,
80 and improve all partners' capacity to be stewards of lake water quality.

81 II. A UNIQUE LAKE WITH UNIQUE NEEDS

82 Great Salt Lake's unique characteristics, particularly salt concentrations that range from freshwater
83 conditions to conditions seven times greater than the ocean, require an approach to water quality that
84 is specific to the lake. Appropriate water quality policies must protect the unique species that depend
85 on the lake, yet more information is needed to know how these unique species respond to pollutants or
86 even to the lake's natural cycles. The lake's salty conditions also affect how a pollutant behaves
87 (i.e., transport, cycling, and storage), and these processes are highly complex and dynamic. This
88 section summarizes the importance of understanding these Great Salt Lake-specific characteristics to
89 meet water quality goals.

90 Lake Level Fluctuations, 91 Salinity, and Ecology

92 Great Salt Lake is a dynamic terminal
93 lake located adjacent to a rapidly
94 growing metropolitan area in Northern
95 Utah (see Figure 1). It is the sixth largest
96 lake in the United States and the world's
97 fourth largest terminal lake. As is
98 characteristic of terminal lakes, Great
99 Salt Lake has no outlet. Water that flows
100 in can only evaporate or percolate
101 through the substrate, leaving minerals
102 and salts behind that continually accumulate. Because the lake is terminal, it is greatly influenced by
103 variations in precipitation and the volume of stream inflows, which in turn dramatically affect lake
104 area and salt concentrations (salinity). Since Great Salt Lake is large (an average 75 miles long and
105 35 miles wide), shallow (average depth of 14 feet), and gently sloping, small changes in the water
106 surface elevation result in dramatic changes in surface area and create a highly variable shoreline. At
107 the historic low elevation of 4,191 feet in 1963, the lake covered 950 square miles. During the 1980s
108 flood, the lake reached an elevation of 4,212 feet and had a surface area of about 3,300 square
109 miles (United States Geological Survey, 2009).



Difference in Great Salt Lake elevation and area between years 1999 and 2009

110 The seasonal and annual change in lake level affects the salinity that dictates the variation in the
 111 lake's aquatic habitats and the aquatic organisms supported. In addition, the gradation in saline
 112 environments from the rivers through the wetlands and into the lake creates many different types of
 113 habitats—uplands, mudflats, river deltas, ephemeral ponds, brackish and freshwater marshes, and
 114 open water with varying salinity—a complexity that attracts millions of birds who contribute to the
 115 lake's unique ecology. For this reason, the Great Salt Lake ecosystem is internationally significant to
 116 migrating and breeding birds and has been designated a regional and hemispheric important site as
 117 part of the Western Hemispheric Shorebird Reserve Network.

118 Lake levels determine not only salinity but also the connectivity/fragmentation between the lake's
 119 major bays. Distinct salinity conditions have developed in the four major bays (Gunnison, Gilbert, Bear
 120 River, and Farmington) due to the rock-filled causeways that separate them. In 1959, the Northern
 121 Pacific Railroad causeway (renamed as the Union Pacific Railroad Causeway) was constructed that
 122 bisected the lake into two halves, Gunnison Bay (North Arm) and Gilbert Bay (South Arm). Bear River
 123 Bay, which receives the majority of freshwater inputs to the lake, is also isolated from Gilbert Bay due
 124 to this causeway. Two additional automobile causeways almost completely isolate Farmington Bay
 125 from Gilbert Bay. With limited exchange flow between the bays, each of these bays is now a
 126 unique—albeit interrelated—ecosystem with different physical and chemical environments. Different
 127 organisms depend on each of the bays due to the salinity, which means that water quality protections
 128 needed to protect lake organisms vary from place to place within the lake. As a result, Utah's water
 129 quality regulations differentiate each bay as well as the lake's surrounding wetlands (see section on
 130 UDWQ's regulatory role).

131 **Gunnison Bay**

132 With limited inflows, Gunnison Bay has become extremely saline (hypersaline) when compared with
 133 the other bays, with an average salinity of 27 percent (UDWQ, 2010). At this level, relatively few
 134 species can survive, and it supports mainly halophilic (“salt-loving”) bacteria that give the bay its red
 135 hue. The highly concentrated salts
 136 in this bay support one of the
 137 lake's mineral extraction facilities
 138 that supplies sulfate of potash, a



Photo courtesy of Charles Uibel—greatsaltlakephotos.com

*Typical Salinities of Great Salt Lake's Bays
 (at high and low lake levels) compared to
 other water bodies:*

Great Salt Lake's Bays:

- Gunnison Bay: 16 to 27%
- Gilbert Bay: 7 to 15%
- Bear River Bay: 1 to 6%
- Farmington Bay: 2 to 6%

Union Pacific Railroad Causeway

139 necessary fertilizer for fruits and vegetables. These high salt concentrations are also ecologically
140 important because they are transported south to Gilbert Bay, which helps maintain healthy salt
141 concentrations for brine shrimp. The salt balance between Gunnison Bay and Gilbert Bay is also
142 crucial to the mineral extraction facilities in Gilbert Bay that contribute to the world's need for
143 magnesium, titanium, and salts. It is not currently known to what extent other chemicals, particularly
144 toxic metals like mercury, are also concentrated within this bay and transported elsewhere within the
145 lake.

146 **Gilbert Bay**

147 Gilbert Bay is also considered hypersaline with historical salinity levels
148 ranging from 7 to 15 percent (UDWQ, 2010). Primary productivity is
149 higher in this bay due to lower salinities, supporting an assemblage of
150 algae and bacteria that are the food source for brine shrimp and brine
151 flies. Brine shrimp and brine flies are the keystone species of the Great
152 Salt Lake ecosystem and are a primary source of food for millions of
153 migrating waterbirds and shorebirds. Brine shrimp are also valuable for
154 the hard-walled eggs they produce (cysts), which are commercially
155 harvested and used worldwide in the aquaculture industry. Brine shrimp
156 thrive in hypersaline conditions with salinity ranges from 11 to
157 17 percent (SWCA Environmental Consultants, 2012). Under these
158 conditions predators and competitors are few and algal
159 production is high, providing brine shrimp with an abundant
160 source of food. Brine shrimp are a critical component of the
161 lake's food web, but they do not survive in all places or at all
162 times in the lake. For instance, conditions in most areas of
163 Gunnison Bay are too saline to support brine shrimp, whereas
164 the water in many areas in Bear River and Farmington Bays are
165 too fresh. Although when lake levels are high and the salinity in
166 the bays change, the brine shrimp will move to places where the
167 conditions suit their productivity. Brine flies play an essential role in converting organic material
168 (algae, bacteria, and organic refuse) entering the lake into food for wildlife living along the lake's
169 shoreline and migrating waterbirds. Brine flies rear on calcified biostromes, which are reef-like
170 structures that cover the lake bed and develop as a result of the precipitation of carbonates by algae
171 (Utah Division of Forestry, Fire, and State Lands [FFSL], 2011).



Photo courtesy of
Wayne Wurtsbaugh

Brine Shrimp



Photo courtesy of Wayne Wurtsbaugh

Biostromes

172 **Bear River and Farmington Bays**

173 Both Bear River Bay and Farmington Bay are less saline (salinities range from 1 to 5 percent [UDWQ,
174 2010]) and support more aquatic organisms than Gilbert Bay and Gunnison Bay. These include
175 aquatic bugs such as Water Boatman (Corixids), Gnats (Midges), and occasionally fish. The salinity
176 levels in both these bays are similar to ocean or marine conditions. Salinity levels also vary within
177 these two bays, from most fresh at the outlets of the major rivers to more saline at the causeway
178 openings between the bays. During the spring runoff period, fish are carried out into these bays from
179 the freshwater wetlands and rivers. In these areas, near freshwater inflows, the bays have salinities
180 closer to freshwater conditions than marine.

181 **Great Salt Lake Fringe and Impounded Wetlands**

182 The wetlands surrounding the lake are unique because they cover a large expanse of inland, alkaline,
183 and saline wetlands that attract and support millions of migrating and breeding birds. They also
184 provide necessary functions such as flood
185 control and water quality improvements
186 by filtering pollutants. Approximately
187 360,000 acres of wetlands exist adjacent
188 to the Great Salt Lake (FFSL, 2011), which
189 represent almost 80 percent of all
190 wetlands in Utah. The wetland areas are
191 generally located along the eastern shore
192 of Great Salt Lake including (from north to
193 south) Bear River Bay, Willard Spur,
194 Ogden Bay, and Farmington Bay. The
195 wetland habitats (emergent wetland, hemi-
196 marsh, mudflats, and playas) occur as fringe wetlands along the lake shore and as impounded wetlands
197 within embankments adjacent to the lake. These aquatic habitats are highly variable in hydrology, species
198 composition, and vegetation in response to lake level fluctuations, elevation, and salinity. The impounded
199 wetlands are both privately and publicly managed to produce high-quality seasonal habitats for
200 millions of migrating and breeding shorebirds and waterfowl (FFSL, 2011).

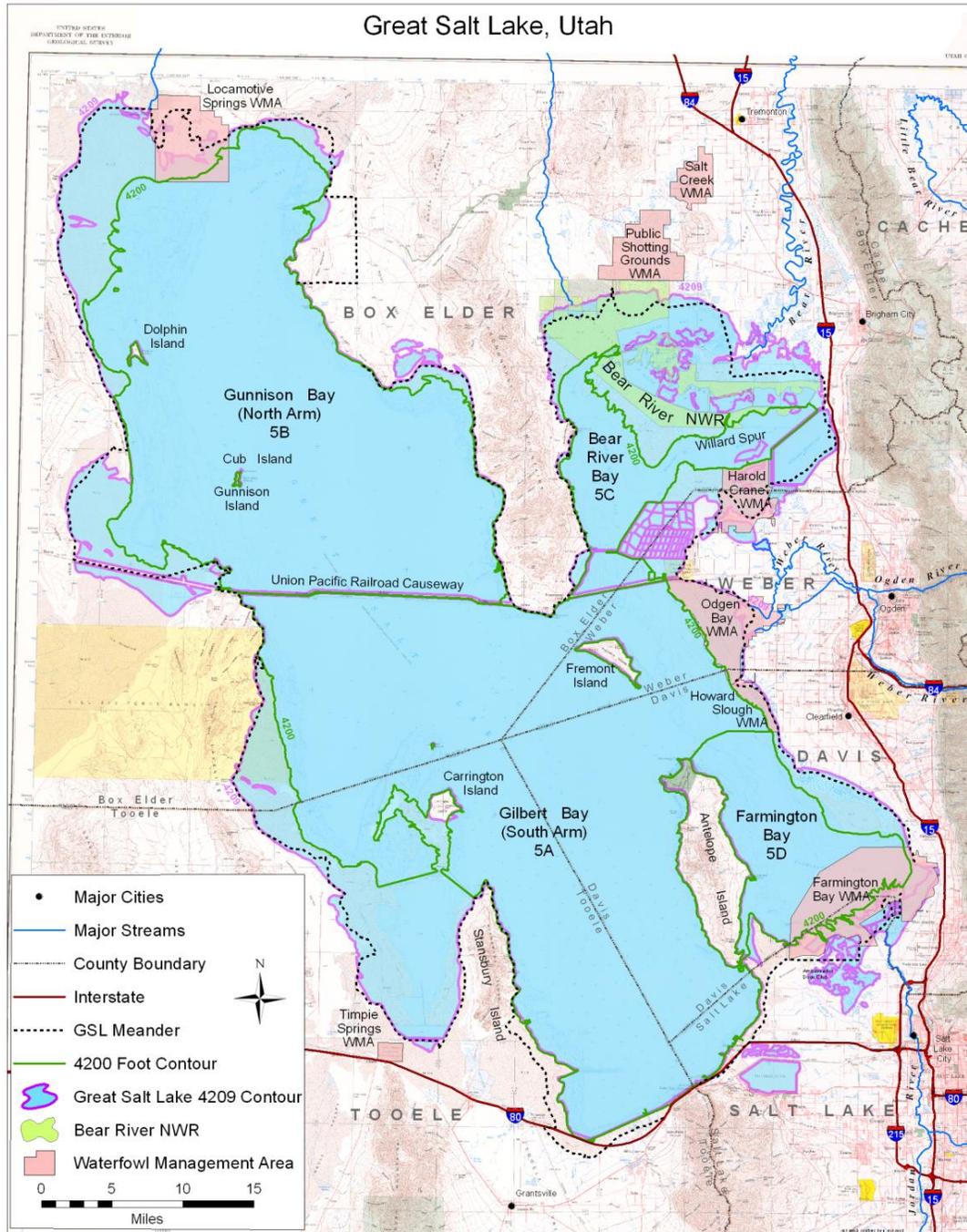


Photo courtesy of Charles Uibel—greatsaltlakephotos.com

Great Salt Lake Wetlands

201 **Water Quality Protections**

202 Lake level fluctuations and salinity and their effects on the ecology of the lake require water quality
203 protections that are specific to this dynamic ecosystem. Increased knowledge of lake water quality
204 under changing hydrologic and saline conditions and for the various beneficial uses requires an
205 adaptive and focused approach.



206

207 **FIGURE 1. GREAT SALT LAKE, UTAH**

208 Great Salt Lake is a saline terminal lake located in Northern Utah. The primary sources of water to the lake are from
 209 precipitation and the Bear, Ogden, Weber, and Jordan Rivers. The lake spans across five county boundaries (Box
 210 elder, Weber, Davis, Tooele, and Salt Lake). The Great Salt Lake meander line represents the boundary of sovereign
 211 lands managed by the FFSL. The historic (1847–1986) average elevation of the lake is 4,200 feet (United States
 212 Geological Survey, 2009). Utah Water Quality Act beneficial uses for Great Salt Lake (Classes 5A through 5E)
 213 extend to an elevation of 4,208 feet. Since this contour is not available spatially, the 4,209-foot contour is shown.

214 **The Potential Threat of Pollutants to the Lake's Beneficial Uses**

215 Great Salt Lake is the lowest point in a 33,000-square-mile drainage basin that encompasses most of
216 Northern Utah, parts of Southern Idaho, western Wyoming, and eastern Nevada. The surrounding
217 drainages contribute approximately 3.5 million acre-feet of freshwater annually to the lake from four
218 large drainage systems—Jordan, Ogden, Weber, and Bear Rivers—and numerous smaller drainages.
219 Approximately 77 percent of Utah's population, or 1.4 million people, live within the watersheds
220 draining to Great Salt Lake (United States Census Bureau, 2012). Agricultural, industrial, and urban
221 development within these watersheds greatly contributes to Utah's vibrant economy, yet this growth
222 has also resulted in significant agricultural, stormwater, and wastewater discharges to Great Salt
223 Lake. As a result, the list of possible contaminants that have flowed into the lake is large and diverse.
224 Possible contaminants of concern include toxic metals, petroleum hydrocarbons, pesticide products,
225 and excessive nutrients, among others (Wadell and Giddings, 2004).

226 Several federal, local, and state agencies have conducted research to evaluate environmental
227 contaminants within the lake and its surrounding wetlands. For instance, UDWQ and collaborators
228 have conducted extensive evaluations of mercury and selenium throughout the past decade. Other
229 pollutants of concern such as nutrients, arsenic,
230 copper, and lead are present at potentially
231 detrimental concentrations when compared
232 with other aquatic ecosystems, but these
233 concentrations may be normal for a terminal
234 lake or may not threaten species that are
235 adapted to the lake's unique environment.

***Approximately 77% of Utah's
population or 1.4 million people live
within the watersheds draining to
Great Salt Lake.***

236 Currently, UDWQ does not have the necessary information to evaluate precisely whether these
237 pollutants are affecting the lake's ecosystem in subtle but important ways, like reducing the hatching
238 success of the ducks and shorebirds. Additional information is needed to further understand what
239 happens when pollutants enter the lake and what levels of pollutants are acceptable in the context of
240 ensuring the long-term support of the lake's beneficial uses. Consistent and reliable monitoring is also
241 needed to identify water quality trends to identify pollutants that are accumulating to potentially
242 unsafe future concentrations.

243 Without comparative pollutant thresholds, UDWQ cannot always determine with acceptable certainty
244 if the beneficial uses are currently being protected. Similarly, it is also difficult to estimate potential
245 water quality effects of proposed developments—such as the proposed expansions of Kennecott Utah
246 Copper and Great Salt Lake Minerals—to the lake's uses. This uncertainty can potentially result in

247 insufficient water quality protection or may unintentionally require excessive levels of protection, which
248 could be costly for industry and Utah taxpayers.

249 **UDWQ's Regulatory Role**

250 Under both state law (UAC R317) and federal Clean Water Act (CWA) authority, UDWQ is entrusted
251 with the responsibility to maintain the chemical, physical, and biological integrity of Utah's surface
252 waters, including Great Salt Lake. Three minimum water quality goals are specified in Section 101(a)
253 of the CWA: (1) water quality that supports propagation of fish, shellfish, and wildlife; (2) water
254 quality that supports recreation in and on the water; and (3) no discharges of toxics in toxic amounts.
255 In order to meet these goals, UDWQ must begin by designating beneficial uses followed by
256 establishing and enforcing water quality criteria. Following is a description of these requirements and
257 the nuances we encounter when making programmatic decisions for Great Salt Lake. This strategy is
258 designed to aid and direct better decision making in the future.

259 **Great Salt Lake Beneficial Uses**

260 Beneficial uses are descriptions of how the water will be used by humans and other organisms, or, in
261 other words, what the water quality is intended to support. The current beneficial uses assigned to the
262 Great Salt Lake (UAC R317-2-6.5) include primary and secondary contact recreation (e.g., water
263 quality sufficient to swim at Antelope Island and/or wade while duck hunting at one of the Wildlife
264 Management Areas) and wildlife protection (a quality sufficient for waterfowl, shorebirds, and other
265 water-oriented wildlife including their necessary
266 food chain). In 2008, the State of Utah
267 (UAC R317-2-6) reclassified the beneficial uses
268 of Great Salt Lake (Class 5) into five subclasses
269 (Classes 5A, 5B, 5C, 5D, and 5E) to more
270 accurately reflect different salinity and
271 hydrologic regimes and the unique ecosystems
272 associated with each of the four major bays and
273 adjacent wetlands (see Figure 2 and Table 1).
274 Classification of Great Salt Lake in this manner
275 allowed UDWQ to develop methods to assess
276 beneficial use support for each of these unique ecosystems. However, changes to this classification
277 system may be needed to address the influence of lake level fluctuations on salinity and how salinity
278 varies from place to place and over time within a bay. Since salinity is the driving force behind what
279 aquatic organisms survive and reproduce, UDWQ is proposing an approach for water quality

What Are Beneficial Uses?

Beneficial uses are descriptions of how the water will be used by humans and other organisms and are classified in UAC R317-2-6 as:

- 1. Drinking Water*
- 2. Recreation*
- 3. Aquatic Wildlife*
- 4. Agricultural Uses*
- 5. Great Salt Lake*

280 protections that relies on levels of salinity, from freshwater to hypersaline, rather than a fixed
 281 geographical boundary.

282 **TABLE 1. BENEFICIAL USES DESIGNATED TO THE GREAT SALT LAKE**

Class	Geographical Boundary	Beneficial Uses
Class 5A: Gilbert Bay	All open waters at or below approximately 4,208-foot elevation south of the Southern Railroad Causeway, excluding all of the Farmington Bay south of the Antelope Island Causeway and salt evaporation ponds.	Protected for frequent primary and secondary contact recreation, waterfowl, shorebirds, and other water-oriented wildlife including their necessary food chain.
Class 5B: Gunnison Bay	All open waters at or below approximately 4,208-foot elevation north of the Southern Railroad Causeway and west of the Promontory Mountains, excluding salt evaporation ponds.	Protected for infrequent primary and secondary contact recreation, waterfowl, shorebirds, and other water-oriented wildlife including their necessary food chain.
Class 5C: Bear River Bay	All open waters at or below approximately 4,208-foot elevation north of the Southern Railroad Causeway and east of the Promontory Mountains, excluding salt evaporation ponds.	Protected for infrequent primary and secondary contact recreation, waterfowl, shorebirds, and other water-oriented wildlife including their necessary food chain.
Class 5D: Farmington Bay	All open waters at or below approximately 4,208-foot elevation east of Antelope Island and south of the Antelope Island Causeway, excluding salt evaporation ponds.	Protected for infrequent primary and secondary contact recreation, waterfowl, shorebirds, and other water-oriented wildlife including their necessary food chain.
Class 5E: Transitional waters along the shoreline of Great Salt Lake	All waters below approximately 4,208-foot elevation to the current lake level of the open water of Great Salt Lake receiving their source water from naturally occurring springs and streams, impounded wetlands, or facilities requiring a Utah Pollution Discharge Elimination System permit. The geographical areas of these transitional waters change according to the fluctuation of open water elevation.	Protected for infrequent primary and secondary contact recreation, waterfowl, shorebirds, and other water-oriented wildlife including their necessary food chain.

Note: (see Figure 1 for location)

283 **Narrative Standard**

284 Narrative and numeric water quality criteria (toxicity thresholds) define specific water quality
 285 objectives that must be met to ensure that each beneficial use is maintained. Great Salt Lake currently
 286 lacks numeric standards for all pollutants except selenium; however, this absence of numeric standards
 287 does not mean the lake remains unprotected. In the absence of numeric standards, the beneficial uses
 288 of Great Salt Lake have instead been protected by the Narrative Standards (UAC R317-2-7):

289 *7.2 Narrative Standards*

290 *It shall be unlawful, and a violation of these regulations, for any person to discharge or*
 291 *place any waste or other substance in such a way as will be or may become offensive*
 292 *such as unnatural deposits, floating debris, oil, scum or other nuisances such as color,*

293 *odor or taste; or cause conditions which produce undesirable aquatic life or which*
294 *produce objectionable tastes in edible aquatic organisms; or result in concentrations or*
295 *combinations of substances which produce undesirable physiological responses in*
296 *desirable resident fish, or other desirable aquatic life, or undesirable human health*
297 *effects, as determined by bioassay or other tests performed in accordance with standard*
298 *procedures.*

299 Narrative standards are inherently subjective but are an important water quality tool because they
300 prohibit undesirable conditions that are sometimes difficult to detect with routine water quality data.
301 For instance, most would agree that it should be unlawful for an individual to dump tires into a lake or
302 stream, but the deleterious effects of this action would be difficult to capture with routine water
303 quality samples. However, the narrative standards are much more difficult to interpret when applied
304 to a water body such as Great Salt Lake that is constantly changing and the potential effects of
305 pollutants in a highly saline system are poorly
306 understood. These uncertainties have resulted in
307 conflicting interpretations regarding whether the
308 lake water quality complies with the Narrative
309 Standard or continues to comply following
310 proposed municipal or industrial developments.
311 These conflicting interpretations, combined with an
312 additional potential for subjectivity due to
313 scientific uncertainty about the lake's ecological
314 processes, makes it more difficult for the
315 regulated community to understand, plan for, and
316 ultimately comply with the Clean Water Act
317 regulations. Similarly existing regulations are
318 more difficult for UDWQ to fairly enforce.

What is the difference between a numeric standard and a narrative standard?

Numeric Standard:

A precise measurable level of a particular chemical or conditions allowable in a water body

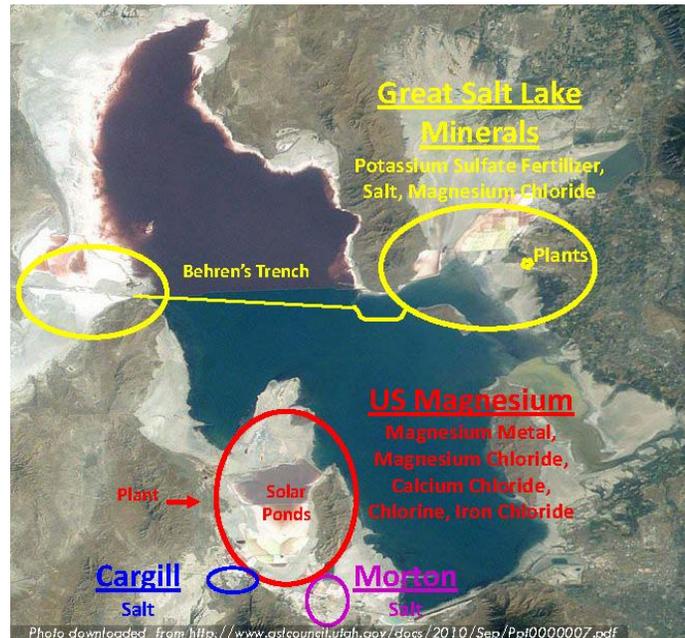
Narrative Standard:

Narrative statement (i.e., free from scum) that establishes water quality goals

319 The approach as proposed in the documents of this strategy is intended to reduce these uncertainties
320 by collecting critical data on the ecosystems and toxicological effects of pollutants on the lake biota.
321 This information will lead to better decision making, which is vital for UDWQ programs such as the
322 Utah Pollution Discharge Elimination System (UPDES) discussed in the next section.

323 **The Permitting Process: Utah Pollution Discharge Elimination System**

324 UDWQ requires and issues UPDES permits
 325 to all entities that discharge pollutants from
 326 a point source to waters of the state,
 327 including discharges of domestic and
 328 industrial wastewater, and more diffuse
 329 sources like stormwater. In the case of
 330 domestic and industrial dischargers, these
 331 permits establish allowable concentrations
 332 of pollutants and/or mass loadings in the
 333 permittee's discharge (and includes
 334 monitoring requirements) to ensure that the
 335 resulting water quality in the discharge is
 336 sufficient to protect the applicable
 337 beneficial uses and that the discharge is
 338 consistent with the antidegradation policy
 339 (UAC-R317-2-3). In the case of stormwater
 340 discharges, permits establish best management practices to insure beneficial uses are protected. The
 341 development of allowable concentrations/ loadings (i.e., permit limits) for Great Salt Lake discharges
 342 has been complicated by the lack of numeric criteria for the pollutants of concern. Permit limits are
 343 based on the most stringent of (1) technology-based effluent limits (which includes, but is not limited to,
 344 secondary treatment standards for municipal wastewater treatment plants and/or categorical effluent
 345 limits prescribed for a given industry), (2) numeric criteria, and (3) application of the Narrative
 346 Standard. Currently, permitted discharges, whether directly to Great Salt Lake or indirectly through
 347 the main rivers, fall into four major classifications: (1) municipal wastewater treatment facilities or
 348 publicly owned treatment works (POTWs),
 349 (2) stormwater discharges, (3) mineral
 350 extraction facility discharges, and (4) other
 351 industrial facility discharges (see Figure 2).
 352 POTWs that discharge directly to the lake
 353 have permit limits that are currently derived
 354 from secondary treatment standards, which are
 355 technology-based limits that establish the
 356 minimum national standards for municipal



Mineral Extraction Facilities

What is a UPDES Permit?

A Utah Pollution Discharge Elimination System (UPDES) Permit is required by all entities that discharge pollutants from a point source to waters of the state.

357 wastewater treatment facilities. Industrial activities such as mining and other common types of
358 industrial dischargers (e.g., chemical manufacturing, refineries, landfills, etc.) have permit limits that
359 are derived from the most stringent among technology-based effluent limits, water-quality-based
360 effluent limits, or best professional judgment. Insufficient information currently exists to ascertain
361 whether these technology-based effluent limits (e.g., secondary treatment standards for municipal
362 wastewater treatment facilities or POTWs) are sufficiently protective of the lake's uses.

363 Over the past decade,
364 both new permits to the
365 lake and permit
366 renewals have been
367 repeatedly appealed.
368 For instance, in 2007 the
369 permit renewal for
370 Kennecott Utah Copper's
371 discharge was appealed
372 and the facility continues
373 to operate under their
374 existing permit. Other
375 industrial and mining



Photo Courtesy of Leland Myers, Central Davis Sewer District

Publicly Owned Treatment Works Facility

376 UDPES permits for ATI Titanium and Great Salt Lake Minerals have also been challenged. The
377 plaintiffs making these appeals disagree with UDWQ's conclusions that technology-based effluent
378 limits (e.g., the Ore Mining and Dressing Effluent Limitation Guideline for ore mining) alone are
379 sufficient to comply with the Narrative Standards. Numeric criteria would eliminate much of the
380 controversy regarding effluent limits, or at least would streamline the appeals process. In addition,
381 numeric criteria would avoid the potential for permit limits being under- or overprotective when they
382 are based on technology-based standards that may or may not be appropriate for Great Salt Lake.



383

384

FIGURE 2. UTAH POLLUTION DISCHARGE ELIMINATION SYSTEM (UPDES) INDUSTRIAL AND MUNICIPAL PERMITS

385 III. STRATEGY COMPONENTS

386 UDWQ's Great Salt Lake Water Quality Strategy is designed to develop numeric water quality
 387 criteria for the lake, improve water quality monitoring and prioritize research, implement a plan to
 388 assess and protect Great Salt Lake wetland water quality, better coordinate and communicate with
 389 key partners and stakeholders, and secure the necessary resources and funding partners to do so.
 390 UDWQ will use the enhanced knowledge to develop appropriate water quality protections to help
 391 ensure that Great Salt Lake continues to benefit Utah citizens now and in the future.



392

393 Specifically, UDWQ will employ a five core component strategy (described in greater detail below):

- 394 **1. Numeric Water Quality Criteria Development**
 395 **2. Strategic Monitoring and Research**
 396 **3. Wetland Program Plan**
 397 **4. Public Outreach Plan**

398 **5. Resource Plan**

399 Details for each component are further described separately in stand-alone documents that contain
400 the rationale, approach, and a proposed implementation schedule. While each component will be
401 described in stand-alone documents, the components are interrelated and not sequential. Much of the
402 work will occur concurrently at a pace defined by resources that can be obtained to meet both short-
403 and long-term project objectives. The wetland program plan will be developed with wetland
404 stakeholders to devise an assessment and implementation framework for wetland specific water
405 quality protections. The public outreach and resource plans will be developed in collaboration with
406 key Great Salt Lake partners and stakeholders to develop a process that facilitates incorporation of
407 feedback throughout implementation of all components of this strategy.

408 **1. Numeric Water Quality Criteria Development**

409 A key component of this strategy is to develop a process that will ultimately allow UDWQ to
410 implement numeric water quality criteria for Great Salt Lake. UDWQ anticipates that in many cases
411 different criteria will be needed for different salinity levels due to changes in the species that require
412 protection. In Core Component 1, the proposed approach is an adaptive process that allows UDWQ
413 to continually improve the numeric water quality goals as our knowledge of the effects of pollutants
414 on the lake's beneficial uses continues to improve. This approach allows UDWQ to capitalize on, to the
415 greatest extent possible, previously conducted scientific investigations while ensuring that results from
416 outside investigations account for the lake's unique chemical and biological environments before they
417 are incorporated into a regulatory framework for the lake . The process also provides UDWQ with
418 tools to improve the scientific underpinnings of regulatory decisions over the short and long term
419 through clearly defined prioritization processes. A draft of UDWQ's proposed approach for
420 developing numeric criteria was released in concert with this overview document.

421 **2. Strategic Monitoring and Research**

422 Conducting strategic, targeted, and sufficiently comprehensive monitoring is critical for understanding
423 current lake conditions and to document deleterious water quality trends. Water quality monitoring
424 has been conducted at Great Salt Lake for decades, but a comprehensive baseline sampling plan has
425 never been implemented. As a result, water quality information is often sporadic and sometimes
426 redundant with several agencies collecting similar data. In addition, robust tests have never been
427 conducted to evaluate whether laboratory methods yield accurate and reliable data, which may not
428 be the case due to complications associated with analyzing hypersaline waters. Clearly, successful
429 implementation of a water quality strategy begins with establishing consistent and reliable data.

430 In Core Component 2, UDWQ presents its strategic monitoring and research plan for Great Salt Lake.
431 The objectives of the plan are to collect environmental samples to assess the current condition of the
432 lake and track spatial and temporal trends of contaminants of concern that may affect the lake's
433 beneficial uses. The plan addresses the accuracy, reliability, and quality of sampling and analyzing
434 various parameters under highly saline conditions. In addition, the plan recommends studies to inform,
435 build on, and advance the monitoring plan aimed at understanding the lake's complex
436 biogeochemistry, hydrology, and ecosystems.

437 Implementation of this monitoring plan will lead to a new level of knowledge about lake conditions
438 and needs, as well as identification of any remaining data gaps critical to developing numeric
439 criteria. The monitoring plan is intended to be adaptive and will be revised as the knowledge and
440 understanding of Great Salt Lake processes improves. Research needed to implement both
441 components will be prioritized according to need and resources. A draft of UDWQ's monitoring
442 approach and associated research objectives was released in conjunction with this water quality
443 strategy.

444 3. Wetland Program Plan

445 Approximately 360,000 acres of wetlands exist adjacent to the Great Salt Lake, which are of critical
446 importance for recreation and biological uses (FFSL, 2011). A comprehensive water quality strategy
447 would be incomplete without explicit consideration of wetland water quality. For several reasons,
448 UDWQ believes that the wetland strategy should be a related yet independent component of the
449 water quality strategy for Great Salt Lake. First, like the open waters of Great Salt Lake, its wetlands
450 are ecologically unique from other wetlands throughout the Intermountain West because of their
451 connectivity to the lake. In addition, the types of criteria to assess and protect the beneficial uses may
452 need to be wetland specific according to wetland type. For example, impounded wetlands that are
453 managed for waterfowl have been hydrologically altered and are different ecologically than the
454 fringe wetlands that surround the lake. Great Salt Lake's numerous wetlands have been subjected to
455 varying degrees of human-caused disturbance so assessment tools to evaluate condition from (poor to
456 good) will be developed.

457 Over the past several years, UDWQ, in collaboration with numerous water quality partners, has been
458 working on improving existing numeric criteria and alternative assessment methods for Great Salt
459 Lake wetlands. To date, UDWQ has primarily focused on the development of tools that will allow
460 UDWQ and our partners to map the extent of these waters and to develop rigorous and
461 comprehensive assessment tools. Despite progress in these areas, a more comprehensive water quality
462 strategy is needed. In particular, UDWQ needs to define how assessment results will be used to refine

463 existing numeric criteria to make them wetland-specific and to broaden their scope to all Great Salt
464 Lake wetlands, not just those found within State Wildlife Management Areas. In addition, this plan
465 should explicitly state how assessment results will be used to identify and subsequently improve waters
466 with degraded water quality conditions.

467 UDWQ intends to develop this strategy in collaboration with stakeholders with varying interests in the
468 protection of Great Salt Lake wetlands. To accomplish this task, UDWQ will hold several stakeholder
469 discussions and open houses to develop a wetland assessment and implementation program plan.

470 **4. Public Outreach Plan—Collaborating with Stakeholders** 471 **and Key Partners**

472 Great Salt Lake has a diverse set of critically interested stakeholders and partners, and collaboration
473 and coordination with them is crucial for this strategy to be credible, effective, and successfully
474 implemented. UDWQ will engage in a robust dialogue with the different public agencies that have
475 responsibilities for and interests in the lake (Utah Department of Natural Resources, United States
476 Environmental Protection Agency, United States Geological Survey, etc.) and with key stakeholders
477 such as industry, municipal governments, hunting and birding associations, and environmental
478 organizations as well as interested citizens. This coordination will focus on both fostering stakeholder
479 review of, input into, and support for the strategy's components and designing the coordination
480 mechanisms between responsible authorities needed to efficiently leverage all parties' efforts for
481 improving the water quality protections for Great Salt Lake. UDWQ is committed to working
482 collaboratively with key partners and stakeholders to devise and implement a process of input,
483 coordination, and participation of the strategy components. To meet this commitment, UDWQ has
484 developed a short-term outreach strategy that discusses plans for unveiling this strategy and the first
485 two core components. Over the next year, UDWQ will work with stakeholders to develop a broader
486 and longer-term communication and outreach strategy that takes outreach efforts through the
487 development and implementation of water quality programs that are aimed specifically at the needs
488 of Great Salt Lake.

489 **5. Resource Plan**

490 UDWQ has or will soon begin many of the foundational planning activities of the strategy, which will
491 be refined with stakeholder input over the coming year. Planning is important, but it is only the first
492 step. Addressing problems with the status quo requires consistent progress toward filling data gaps
493 and developing new lake-specific water quality criteria. UDWQ anticipates that full implementation
494 of this strategy, including enactment of new water quality criteria or other alternative protection

495 measures, will take much of the next decade. Many of these activities are reliant on gaining support
496 for the strategy and acquiring the resources needed to continue its robust implementation. After the
497 objectives for each component are better defined with stakeholder input, the needs, prioritization, and
498 resources necessary to implement the components will be identified. These details will be provided in
499 the related core component documents, but efficient use of limited resources can only be realized with
500 a comprehensive review of research and data collection needs. An important aspect of this component
501 is continued collaboration with other state and federal agencies to help identify efficiencies that can
502 be achieved through cooperative monitoring and research activities. UDWQ looks forward to
503 engaging with its many partners and stakeholders who share a profound interest in protecting the
504 water quality of Great Salt Lake and its important beneficial uses. Over the next year, UDWQ will
505 create a document that summarizes short- and long-term resources that are needed to ensure
506 continued progress in meeting strategy objectives.

507 VI. IMPLEMENTATION

508 Over the next year, UDWQ will finalize the initial planning documents for all strategy components. At
509 a minimum, these strategic planning documents will be revisited every 3 years to ensure that they
510 remain relevant water quality planning documents.

511 Many efforts are already underway that can directly feed into the organizational structure of this
512 framework (see Section V and Appendix 1 for more details). Other activities specifically related to
513 meeting core objectives are also underway. For instance, in 2011, UDWQ and our partners
514 completed the first year of routine sampling identified in the strategic monitoring plan (see Core
515 Component 2). Data obtained from these efforts are being evaluated to decide whether revisions to
516 proposed field or laboratory procedures are warranted. Similarly, UDWQ is conducting preliminary
517 reviews of existing studies that could potentially serve as catalysts for numeric criteria development
518 (see Core Component 1).

519 Ongoing progress is important to ensure that momentum toward strategy implementation is
520 maintained. However, real progress toward meeting long-term goals requires development of
521 concrete goals that are specific to each core component. Specifically, UDWQ has proposed 3-, 5-,
522 and 10-year implementation goals for each core component. These goals may need to be adapted to
523 accommodate resources that can be applied to these efforts. However, goals will always be written
524 with enough specificity to ensure accountability for whatever resources can be brought to bear toward
525 meeting these water quality objectives.

526 VII. LEVERAGING RELATED GREAT SALT LAKE WATER QUALITY EFFORTS
527 AND SUPPORTING OTHERS' EFFORTS

528 UDWQ is engaged in efforts in several areas that already exemplify how the strategy will be
529 developed and implemented and/or will be informed or improved by the implementation of this
530 strategy. Some of these efforts are specific UDWQ activities related to ongoing lake water quality
531 concerns. For instance, UDWQ continues to collaborate on numerous studies aimed at understanding
532 the effects of selenium and mercury pollution on lake health. Outside of the Division's direct actions,
533 many other Great Salt Lake efforts require UDWQ's support and offer opportunities for coordination.
534 For example, water quality is a key element of the FFSL Great Salt Lake Comprehensive
535 Management Plan, and UDWQ has actively participated in their recent efforts to revise the plan to
536 include lake level management strategies and increased coordination amongst state agencies. This
537 strategy will inform the water quality aspects of their management decisions such as changes in water
538 quality that can occur due to new or
539 existing mineral leases. UDWQ also
540 continues to participate with the legislative
541 Great Salt Lake Advisory Council, who will
542 undoubtedly play a pivotal role in the
543 successful implementation of this strategy.
544 These efforts and others are described in
545 more detail in Appendix 1 to this
546 document because together they convey some of the challenges posed with the status quo and the
547 benefits that could potentially be realized through strategy implementation.

UDWQ is committed to fulfilling its duty to protect the water quality of Great Salt Lake based on sound scientific principles and current and accurate information.

548 In order for this strategy to be successful, it will be critical to continually link these related efforts and
549 future indirect efforts back to the strategy's organizational framework. Similarly, efforts should be
550 made to apply information obtained from strategy-specific efforts to other management objectives
551 whenever possible. Such coordination will only be realized if UDWQ directly engages with all
552 stakeholders—from other government agencies, to elected representatives, to Utah citizens—in the
553 development and implementation of the strategy.

554 VIII. CONCLUSION

555 UDWQ is committed to fulfilling its duty to protect the water quality of Great Salt Lake based on
556 sound scientific principles and current and accurate information. UDWQ has developed this water
557 quality strategy to improve its capacity to do so and believes that implementing this strategy will
558 result in improved water quality protection of the lake's beneficial uses, greater certainty for
559 regulated industries and cities, and more effective use of scarce resources by all concerned.

560 UDWQ looks forward to engaging key stakeholders and partners in the strategy's successful
561 conceptualization, development, and implementation. Over time, this strategy will improve UDWQ's
562 ability to provide clarity and certainty for those who use the lake and its resources in a manner
563 consistent with UDWQ's mandate to protect the lake's beneficial uses for today and future
564 generations.

565 IX. REFERENCES

566 Bioeconomics, Inc., 2012. *Economic Significance of the Great Salt Lake to the State of Utah*. Prepared
567 for Great Salt Lake Advisory Council. January 26, 2012.

568 SWCA Environmental Consultants, 2012. *Definition and Assessment of Great Salt Lake Health*. Prepared
569 for Great Salt Lake Advisory Council. January, 2012.

570 United States Census Bureau. 2012. 2010 US Census QuickFacts. <http://quickfacts.census.gov/>

571 United States Geological Survey. 2009. *Great Salt Lake: Lake Elevations and Elevations Changes*.
572 <http://ut.water.usgs.gov/greatsaltlake/elevations/>

573 Utah Division of Forestry, Fire, and State Lands (FFSL). 2011. *Great Salt Lake Comprehensive*
574 *Management Plan Revision*. Draft.

575 Utah Division of Water Quality (UDWQ). 2010. *Utah's 2010 Integrated Report*.

576 Wadell, K.M. and E.M. Giddings. 2004. *Trace Elements and Organic Compounds in Sediment and Fish*
577 *Tissue from the Great Salt Lake Basins, Utah, Idaho, and Wyoming, 1998–99*. USGS Water-
578 Resources Investigations Report 03-4283.

579

580 APPENDIX 1:
581 ONGOING ACTIVITIES RELATED TO STRATEGIC PLANNING
582 EFFORTS

583 **Leveraging Related Water Quality Efforts**

584 **Willard Spur Site-specific Water Quality Standard**

585 Construction of the Perry/Willard Regional Wastewater Treatment Plant (PWRWTP) was completed
586 in 2010. The Utah Division of Water Quality (UDWQ) received numerous comments as part of the
587 public notice process for the PWRWTP's Utah Pollution Discharge Elimination System (UPDES)
588 discharge permit to Willard Spur. Many of these comments expressed concern over the potential
589 impact that the effluent could have on the water body and petitioned UDWQ to prohibit all
590 wastewater discharges to Willard Spur or to alternatively reclassify Willard Spur to protect the
591 wetlands and current uses of the water. Although the Utah Water Quality Board denied the petition,
592 the Water Quality Board directed UDWQ to develop a study designed to establish defensible
593 protections (i.e., site-specific numeric criteria, antidegradation protection clauses, beneficial use
594 changes, etc.) for the water body. The Water Quality Board also directed UDWQ to pay
595 for phosphorus reductions at the PWRWTP while the study is conducted. This path forward, developed
596 in conjunction with stakeholders, allows the PWRWTP to operate while the studies are underway, with
597 reasonable assurances that the effluent will not harm the ecosystem. Critical to the success of this
598 approach is the involvement of the Steering Committee and Science Panel to provide input, guide
599 research, and provide recommendations to UDWQ. UDWQ is facilitating this process, and final
600 recommendations of the appropriate water quality protections for Willard Spur will be made to the
601 Utah Water Quality Board. For more information please visit <http://www.willardspur.utah.gov/>.

602 **Great Salt Lake Wetlands Assessment**

603 Historically, UDWQ applied numeric water quality standards to protect recreation and warm water
604 aquatic life beneficial uses for the state Wildlife Management Areas and the Bear River Migratory Bird
605 Refuge. However, UDWQ found that applying existing water quality standards to these wetlands was
606 problematic for two reasons. First, the standards applied were based on the geographical location of the
607 wetland rather than their ecological characteristics and represented only a subset of the wetlands around
608 Great Salt Lake. Second, the standards applied were based on rivers or "flowing" systems and were not
609 applicable to wetland biota.

610 To address these issues and in response to stakeholder concerns of excessive algae in the Great Salt Lake
611 impounded wetlands, UDWQ and its partners have expended considerable time and resources to

612 build an ecological understanding of wetlands around Great Salt Lake and how they support
613 designated recreation and aquatic wildlife uses. To date, UDWQ has developed a preliminary
614 Multimetric Index (MMI) for the Great Salt Lake Impounded Wetlands that includes quantitative
615 indicators of water chemistry, submerged aquatic vegetation, surface mats, and benthic
616 macroinvertebrates. These indicators provide multiple lines of evidence that together quantify the
617 relative condition of Great Salt Lake's impounded wetlands. Ultimately, this MMI will allow UDWQ to
618 assess support of aquatic life beneficial uses for these waters. Ongoing data collection and research
619 will focus on improving and validating the assessment framework. The MMI for impounded wetlands
620 represents the first step toward UDWQ's management program for assessing all of Great Salt Lake
621 Wetlands. Program tasks to be completed in an iterative manner include the following: (1) develop
622 monitoring and assessment methods for wetland ecosystems starting with impounded and fringe
623 wetlands (representing the majority of Great Salt Lake wetland classes), (2) adopt an assessment
624 (decision) framework, and (3) revise existing water quality standards as appropriate and necessary
625 to protect beneficial uses. For more information please visit
626 <http://www.deq.utah.gov/Issues/gslwetlands/index.htm>.

627 **Implementation of the Great Salt Lake Selenium Criterion**

628 The Utah Water Quality Board promulgated a selenium criterion for Gilbert Bay in November 2008.
629 The selenium criterion, Great Salt Lake's first numeric criterion, is 12.5 milligrams per kilogram
630 (mg/kg) dry weight in bird eggs (Utah Administrative Code R317-2-14). This criterion is intended to
631 be protective for all birds and aquatic life in Gilbert Bay. In addition to the criterion, lower selenium
632 concentrations were adopted as triggers for additional action. UDWQ periodically collects and
633 analyzes bird eggs from Gilbert Bay for selenium to assess if selenium is impairing the beneficial uses
634 (see Component 2). Selenium is a good example of the benefits of using an iterative and adaptive
635 process. The initial goal of determining a numeric criterion for selenium was met. However, the lack of
636 data regarding the relationship between selenium concentrations in water and eggs has hampered
637 the full implementation of the selenium criterion. For instance, the water concentration that would result
638 in eggs exceeding 12.5 mg/kg is unknown, and the significance of this data gap was not fully
639 understood until implementation of the criterion for the UDPES program. Until this relationship is better
640 characterized, the triggers are intended to ensure that action can be taken before the criterion is
641 exceeded. The egg tissue criterion has technical challenges in implementation such as representative
642 sampling, sampling limited to the nesting season only, and negatively impacting the very resource it
643 was intended to protect (destroying bird eggs to analyze for selenium). UDWQ continues to explore
644 methods for filling this data gap. For more information, please visit
645 http://www.deq.utah.gov/workgroups/gsl_wqsc/selenium.htm.

646 Great Salt Lake Mercury Assessment

647 In 2003, water column measurements conducted by the United States Geological Survey reported
648 elevated methyl mercury concentrations, some of the highest recorded levels in the United States
649 (Naftz et al., 2008). Waterfowl breast muscle tissue was then analyzed for total mercury because of
650 the potential for mercury to accumulate in the Great Salt food chain, from algae, plants, and bugs to
651 waterfowl and local hunters. Testing from 3 of the 10 waterfowl species in 2005 and 2006 showed
652 mean mercury concentrations in the waterfowl breast muscle tissue above the screening value of
653 0.3 part per million (Naftz et al., 2008). In response, the Utah Department of Health issued the first
654 United States waterfowl consumption advisory for the 3 species of waterfowl (Cinnamon Teal,
655 Northern Shoveler, and Common Goldeneye). These elevated mercury concentrations were the
656 impetus for additional investigations into possible toxic exposures to the biota of Great Salt Lake and
657 to people who hunt waterfowl. UDWQ devoted considerable resources in 2007 and 2008 to assess
658 the extent to which mercury poses a risk to Great Salt Lake aquatic birds and organisms in their food
659 chain. Researchers from the United States Fish and Wildlife Service, Utah Division of Wildlife
660 Resources, United States Geological Survey, Utah State University, and UDWQ collected data in the
661 water, sediment, and aquatic birds and their food chain for mercury concentrations from key focus
662 areas funded by a United States Environmental Protection Agency (EPA) grant and state funds. The
663 data from this study and others were compiled and compared with literature benchmarks assembled
664 by the EPA. While these efforts have greatly improved UDWQ's understanding of mercury in Great
665 Salt Lake, significant questions currently remain. For instance, selection of the most appropriate
666 benchmarks to use for quantifying biological responses to mercury has not been finalized. In addition,
667 the link between avian tissue concentrations and exposure to Great Salt Lake as opposed to other
668 waters visited by birds remains unknown. These data gaps will be investigated and incorporated into
669 an ecological risk assessment framework and the development of numeric criteria to help UDWQ
670 determine if the lake's beneficial uses are protected or not due to mercury pollution. For more
671 information, please visit the Statewide Mercury Workgroup website at
672 <http://www.deq.utah.gov/Issues/Mercury/workgroup.htm>.

673 Jordan River Total Maximum Daily Load

674 The Jordan River is one of three major tributaries to Great Salt Lake. Water quality in the Jordan
675 River does not meet water quality standards and UDWQ is thus required to conduct a total maximum
676 daily load analysis (TMDL). The TMDL process identifies causes and sources of pollutants, allocates
677 pollutant loads sufficient to meet water quality standards to the various sources, and helps inform all
678 parties about what actions are necessary for Jordan River water quality to meet the water quality
679 standards. Implementation of the Jordan River TMDL could result in improvements in the water quality

680 delivered to the wetlands and ultimately to the lake. For more information please visit
681 <http://www.waterquality.utah.gov/TMDL/JORDAN/index.htm>.

682 **The Utah Water Quality Board**

683 The Utah Water Quality Board guides the development of water quality policy and regulations in the
684 state. The Board's makeup, defined by statute in the Utah Code, Section 19-5-103, is designed to
685 represent various interest groups of the water quality community. As a result, the Board is ideally
686 suited to help UDWQ ensure that the strategy ultimately produces water quality goals that
687 adequately protect the Great Salt Lake ecosystem without placing unnecessary or inefficient
688 regulatory burdens on industry or Utah taxpayers. The Board is appointed by the governor, with the
689 consent of the Utah State Senate. UDWQ is the administrative arm of the Board. The Board will
690 interface with the water quality strategy in significant ways such as endorsing its purpose and
691 direction, authorizing resources to UDWQ (if requested of the Board) needed to enact this strategy,
692 and reviewing and approving any future water quality standards that might be proposed as part of
693 the strategy. For more information please visit
694 <http://www.waterquality.utah.gov/WQBoard/index.htm>.

695 **Supporting and Supplementing Other Great Salt Lake Efforts**

696 **The 2010 Update of the Great Salt Lake Comprehensive Management Plan**

697 The Utah Division of Forestry, Fire, and State Lands (FFSL) is charged by law to manage Great Salt
698 Lake for multiple use and sustained yield. The 2000 Great Salt Lake Comprehensive Management
699 Plan (CMP) and the 1996 Great Salt Lake Mineral Leasing Plan are considered the current governing
700 documents for the management of the sovereign lands and resources of the lake. In 2010, FFSL
701 coordinated with multiple agencies to revise the CMP to address current issues and concerns regarding
702 the resources of the lake and to ensure that management decisions made by FFSL in the future
703 continue to reflect FFSL's updated understanding of its public trust responsibilities (FFSL, 2010). As a
704 member of the planning team, UDWQ has been actively engaged in this process and substantively
705 contributed to the discussions on the CMP's water quality component. The priorities and components of
706 UDWQ's water quality strategy, as well as new information obtained as part of this strategy, will
707 help inform UDWQ's input into the CMP, FFSL decisions based on lake level, and the future
708 coordination board. Collaboration will improve efficiency and help to ensure that any future water
709 quality regulations best balance the many ecological and economic uses provided by Great Salt
710 Lake. For more information, please visit <http://www.ffsl.utah.gov/sovlands/gsl.php>.

711 The Great Salt Lake Advisory Council

712 Through adoption of House Bill 343 during the 2010 general session of the Utah Legislature, the
713 Great Salt Lake Advisory Council—consisting of elected officials from communities surrounding the
714 Lake and primary stakeholders— was created to advise/assist the governor, Utah Department of
715 Natural Resources, and Utah Department of Environmental Quality on the sustainable use, protection,
716 and development of Great Salt Lake in terms of balancing: (1) sustainable use, (2) environmental
717 health, and (3) reasonable access for existing and future development. In 2011, the Great Salt Lake
718 Advisory Council commissioned two studies to define the ecological health of the Great Salt Lake
719 ecosystem and report on the economic significance of Great Salt Lake to the state of Utah. Together
720 the information generated by these reports highlight the importance of the Great Salt Lake ecosystem
721 as a natural and economic resource to the region and state of Utah and warrants a high level of
722 protection from the state. Specifically, the ecological health study showed that most ecological targets
723 surrounding Great Salt Lake were considered to be in good health; however, some targets, such as
724 the open water of bays and unimpounded marsh complexes, were found to have a high level of
725 uncertainty due to the lack of data and scientific understanding. The level of water-borne pollutants
726 that could impair the ecological health of the birds, brine shrimp, and brine flies was listed by the
727 scientific panel as the highest priority for future research. Several habitats were found to be in poor
728 or fair health, including the impounded wetlands around Farmington Bay and the open water of
729 Gunnison Bay (SWCA Environmental Consultants, 2012). Economically, Great Salt Lake contributes a
730 staggering \$1.32 billion dollars in total economic output to the state of Utah based on mineral
731 extraction, aquaculture, and recreational uses and accounts for \$373 million dollars in total labor
732 income and 7,700 full- and part-time jobs (Bioeconomics, Inc., 2012). The industries that generate this
733 economic output are those that are required to have UPDES permits to discharge to the lake and are
734 dependent on accurate information for design and operation. The information generated by these
735 reports will inform the UDWQ's water quality strategy; and in turn the water quality strategy, through
736 the development of numeric water quality criteria and more efficient monitoring and research, will
737 help direct the Council's deliberations on the science of the lake's sustainable use and environmental
738 health. Engaging the Advisory Council throughout the development and implementation of this water
739 quality management strategy will help to ensure that water quality is sufficient to maintain the lake's
740 uses for future generations, without unnecessarily impeding the economic development of surrounding
741 communities. For more information, please visit <http://www.gslcouncil.utah.gov/index.htm>.

742 **References**

743 Bioeconomics, Inc., 2012. *Economic Significance of the Great Salt Lake to the State of Utah*. Prepared
744 for Great Salt Lake Advisory Council. January 26, 2012.

745 Naftz, D., C. Angeroth, T. Kenney, B. Waddell, N. Darnall, S. Silva, C. Perschon, and J. Whitehead.
746 2008. "Anthropogenic Influences on the Input and Biogeochemical Cycling of Nutrients and
747 Mercury in Great Salt Lake, Utah, USA." *Appl Geochem*. Vol. 23. pp. 1731–1734.

748 SWCA Environmental Consultants, 2012. *Definition and Assessment of Great Salt Lake Health*. Prepared
749 for Great Salt Lake Advisory Council. January, 2012.

750 Utah Division of Forestry, Fire, and State Lands (FFSL). 2010. Sovereign Lands at the Great Salt Lake.
751 [http://www.ffsl.utah.gov/sovlands/Great Salt Lake.php/](http://www.ffsl.utah.gov/sovlands/Great%20Salt%20Lake.php/)

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